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December 23, 2016

The Honorable Steven I. Locke  
United States District Court  
Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, NY 11722

***Re: 2:15-cv-03500-LDW-SIL  
Plaintiff's First Letter Motion for Leave to File Amended Complaint,  
Proposed Summons, and Return of Service Under Seal***

Dear Judge Locke:

The James Law Firm, PLLC represents Plaintiff in the above captioned matter. On June 16, 2015, Plaintiff filed its Complaint against Defendant, John Doe Subscriber assigned IP Address 71.241.153.175.

On August 23, 2016, this Honorable Court granted Plaintiff leave to Serve a Third Party Subpoena on the Defendant's Internet Service Provider, Verizon Internet Services [CM/ECF 12] to obtain the Defendant's identifying information. Plaintiff served the subpoena on the ISP on September 2, 2016 and received the ISP's response on November 6, 2016. Plaintiff has investigated the information provided by the ISP and has decided to proceed with its case against the subscriber.

Pursuant to the Court's August 23, 2016 Order, the case is to be litigated in the name of "John Doe" until further order of the Court. As such, Plaintiff cannot publically name the Defendant at this point. Accordingly, Plaintiff respectfully requests that the Court permit Plaintiff to file its Amended Complaint and proposed summons in the Defendant's name, as well as the return of service, under seal.

By: Jacqueline M. James

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